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August 6, 2015

**VIA E-MAIL TRANSMISSION
AND ECF FILING**

The Honorable Robert E. Gerber
United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
Alexander Hamilton Custom House
One Bowling Green
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.
Case No. 09-50026 (REG)**

Letter Regarding Status of Pillars' No Stay Pleading

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC ("**New GM**") in the above-referenced matter. We write to provide the Court, pursuant to Your Honor's Endorsed Order dated May 5, 2015 [Dkt. No. 13131], with an update on developments in proceedings relating to New GM's Motions to Enforce.

As the Court was informed by New GM's letter dated July 24, 2015 [Dkt. No. 13320] ("**July 24 Letter**"), New GM filed with the United States District Court for the Eastern District of Michigan ("**Michigan District Court**"), in the case captioned *Pillars v. General Motors LLC*, Case No. 15-11360 ("**Pillars Lawsuit**"), a *Motion For Leave To File Amended Notice Of Removal And Amended Answer* ("**Motion to Amend**"). On August 5, 2015, the Michigan District Court granted the Motion to Amend ("**Order**"), which permits New GM to amend its Answer and Notice of Removal to correct the inadvertent error respecting the language found in Section 2.3(a)(ix) of the Sale Agreement. A copy of the Order is attached hereto as **Exhibit A**.

Pursuant to the Order, New GM filed: (i) *General Motors LLC's First Amended Answer to Plaintiffs Amended Complaint*, and (ii) *Defendant's Amended Notice of Removal*, in the

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Michigan District Court, which corrected the inadvertent error. Copies of these pleadings are attached hereto as **Exhibits B** and **C**, respectively.

Respectfully submitted,

/s/ Arthur Steinberg

Arthur Steinberg

AJS/sd
Encl.

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